

Call for feedback - Local Government Outcomes Framework
Ministry of Housing, Communities and Local Government

UK100 Submission
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Q5. How would you like to see the framework used as a tool to support local authorities and local partners to deliver against key national outcomes?

We are a network of 119 local and combined authorities, and we are responding based on our insights from our members and recent conversations we have held with our members.

- The Framework should be used as a supportive tool rather than a purely regulatory and compliance mechanism, empowering councils to prioritise local needs while aligning with national outcomes.
- It should provide a shared language and set of reference points for conversations between citizens, local and central government, making it easier to coordinate across departments and tiers of government.
- By reducing fragmented reporting, the Framework can simplify accountability and transparency arrangements and give councils greater flexibility to direct resources where they have the greatest impact.
- It should highlight opportunities for place-based collaboration with local partners (NHS, businesses, community groups), encouraging joint investment and delivery around shared outcomes.
- It could also embed cross-cutting priorities such as climate action, health, and inequality reduction, recognising their role in delivering co-benefits across multiple outcomes. Climate and nature are under-represented in the outcomes presently, but with national net zero targets and a lack of a statutory duty, it becomes critical for climate metrics to be incorporated here.

- The Framework should be accompanied by practical guidance, data tools, and capacity support, enabling councils to use outcome data to plan, track, and learn, rather than just report.
- Used well, it can help surface systemic barriers to local delivery (e.g. siloed funding streams, misaligned incentives) and provide a route for government and councils to jointly co-produce solutions and resolve them.

Q6. How would your organisation use the Framework either in its own work or when working with partners?

- We would use the Framework to support our members to deliver and advocate for greater climate and other action from our members and non-members. It would also be useful for local authorities to be even clearer about what is valued and where they can and do make the most impact through their interventions and delivery. If it is not measured and reported, there is a risk that it is not valued and delivery deprioritised.
- It would also be useful to encourage joined-up working to deliver on the co-benefits of programmes. We released a report earlier this year on the [wider benefits of climate action](#) and this will help us take that work and recommendations forward as well.
- It would also be useful to align the local climate action with wider national outcomes, helping demonstrate how local climate targets can contribute to the national legal targets around net zero.
- It could also be a useful tool to strengthen collaboration between councils and local partners, positioning ambitious climate action as a key driver of positive outcomes for communities.

Q7. Do you have views on how the Framework can best support local innovation, partnership working and long-term planning?

- The emphasis on outcomes over processes creates space for councils to innovate locally, as it allows flexibility in how results are achieved rather than prescribing specific activities.
- By drawing on existing, comparable data sources, the Framework can give councils and their partners a common evidence base to track progress, identify gaps, and coordinate efforts.
- The broad set of outcomes offers an opportunity to spot links between different policy areas (e.g. health, housing, environment), encouraging cross-departmental and cross-sector partnerships.
- Having a single, accessible Framework can help councils align long-term plans with national priorities, providing clarity on what success looks like and reducing duplication in reporting.
- The shared outcomes can also serve as a **common reference point for partnership building**, helping to align local stakeholders, such as other

parts of the public sector, businesses, community groups, and health partners around shared goals and measures of success.

HOUSING

Q12 To what extent do you agree that these are appropriate measures to assess local progress against the priority outcome (given the standards set out in paragraph 27 of the feedback document)?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Proportion of rental housing in LA area deemed decent	✓				
Net additional dwellings		✓			
House price to workplace based earnings ratio		✓			
Proportion of homes rated EPC C and above	✓				
Enforcement action taken by local authorities against 11m+ buildings under the Housing Act 2004		✓			
Completed remediation for unique buildings		✓			
Proportion of LA-owned social housing deemed decent	✓				
Total new homes delivered as a % of existing total area stock		✓			
Percentage of planning applications decided on time (dwellings)		✓			
Year-on-year change in social rented dwellings held in LA HRA		✓			
Private Rented Sector enforcement [placeholder]	✓				
Social housing demand [placeholder]	✓				

Q13. If you disagreed with any of the metrics in the question above, please explain why

- Focuses too heavily on stock numbers and enforcement, without showing whether homes are sustainable, affordable, or resilient.
- Counting “net additional dwellings” and “total new homes delivered” only measures volume; it does not capture the gap between housing demand and delivery, which is more critical. Nor does it capture the quality of the homes in terms of energy efficiency.
- EPC inclusion is welcome but should be linked to retrofit, fuel poverty, and the Warm Homes Plan to show progress over time. Also, as EPCs themselves are getting reformed and Future Homes Standard might come in, these would need to be updated/ included as policy and regulation develops.
- “Planning applications decided on time” rewards speed over quality and does not reflect alignment with climate or housing goals.
- Social housing demand as a placeholder is too blunt, as demand is shaped by wider structural drivers; progress should be assessed on meeting need.
- Private rented sector enforcement could misrepresent progress if measured only by enforcement volume rather than proactive improvement.

Q14. Do you think any other metrics should be added to indicate progress towards a priority outcome?

If you suggest alternative metrics please provide specific examples including links to data sources. They must meet our data standards as detailed in paragraph 27 of the feedback document

- **Retrofit measures and Energy efficiency upgrades:** Local government already implement various schemes through grant funding and the data for these is tracked. The Warm Homes Plan will be investing £13.2 billion. While not reported across all areas it could be a good starting point to track these measures. They are also linked to wider benefits around reduced fuel poverty, health and wellbeing among others. Tracking progress across tenures would also be useful capturing the delivery challenges of the owner occupied, private rental and social housing sectors.
- **Heat pump installations** through government grants etc. would be tracked and useful to report on. For instance, the [Boiler Upgrade Scheme data](#)
- **[Fuel poverty statistics](#):** Tracking fuel poverty levels at a local authority level would provide a clear picture of households struggling with energy costs. The data is already captured and released annually, providing a useful metric for councils to monitor support needs and target interventions, linking to health, wellbeing, and energy efficiency goals.

- Other metrics that could be useful particularly as temperatures rise each year would be the impacts of over-heating and measures to adapt as well as rates around overcrowding in homes.

Q15. The metric ‘Proportion of rental housing in local authority area deemed decent’ uses modelled data given the lack of suitable alternatives. To what extent do you think the use of modelled data is suitable?

- Modelled data could be a practical solution where direct measures are not available, but transparency on methodology and assumptions is essential.
- Wherever possible, modelled data should be complemented with local authority-collected data, survey evidence, or inspection findings to ground-truth results.
- If outcomes are linked to funding or interventions, the data needs to be very reliable; modelled estimates may not always be strong enough for this.
- Using modelled data can hide important local differences and local context and needs to be evaluated looking at the complete picture of a place.
- In the long term, government should invest in improving direct housing condition datasets.

Q17. Relevant contextual information will be presented alongside the metrics e.g. detail of influencing factors outside of local authority control such as population demographics or geography. Is there specific contextual information you think should be captured alongside any of the metrics?

Please be as specific as possible

The Framework takes a one-size-fits-all approach, but indicators need to be reviewed in line with local circumstances. Geography and urban/rural differences affect housing delivery and improvements, as location impacts density, access to services, and feasibility of interventions.

NEIGHBOURHOODS

Q64 To what extent do you agree that these are appropriate measures to assess local progress against the priority outcome (given the standards set out in paragraph 27 of the feedback document)?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
People agree adults in their communities can be trusted					
Anti-social behaviour [placeholder]					
People feel they can influence local decisions		✓			

People are satisfied with community / cultural facilities [placeholder]					
People are satisfied with their local area as a place to live					
Physical visits of people into library premises per population [placeholder]					
Fly tipping enforcement actions per incident					
Access to green spaces [placeholder]	✓				

Q65. If you disagreed with any of the metrics in the question above, please explain why

- We believe public participation is critical for local policy design and implementation of programmes. However, community engagement at a local level is dependent on the council having the necessary resources, funding and capacity to be able to engage residents effectively. The metric “People feel they can influence local decisions” would capture perception but does not assess the quality, depth, inclusivity, or representativeness of engagement.

Q66. Do you think any other metrics should be added to indicate progress towards a priority outcome?

If you suggest alternative metrics please provide specific examples including links to data sources. They must meet our data standards as detailed in paragraph 27.

- Local air quality trends to track improvements linked to transport decarbonisation or reduced emissions from buildings. While these could fit with transport as well it showcases the quality of life in an area.
- Progress on low-carbon transport/ connectivity – proportion of journeys made by walking, cycling, or EV uptake locally. The connectivity could highlight the ease of access to essential services for residents.

Q68. Relevant contextual information will be presented alongside the metrics e.g. detail of influencing factors outside of local authority control such as population demographics or geography. Is there specific contextual information you think should be captured alongside any of the metrics? Please be as specific as possible

- Population demographics and household composition, as age, income, and household size can influence participation in local decisions and access to green spaces.

- Geography and urban/rural differences, since location affects availability, quality, and accessibility of green spaces, as well as engagement opportunities.
- Existing green infrastructure and biodiversity, including tree cover, habitat quality, and protected areas, to contextualise access and environmental outcomes.

ENVIRONMENT, CIRCULAR ECONOMY AND CLIMATE CHANGE

Q69. To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome (given the standards set out in paragraph 27 of the feedback document)?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Deaths attributable to particulate air pollution (particulate matter less than 2.5 micrometres in diameter [PM2.5])		✓			
% of total household waste sent for recycling/ compost/ reuse		✓			
% of total household waste that is collected separately as food waste		✓			
Flood protection [placeholder]	✓				
Biodiversity [placeholder]	✓				

Q70. If you disagreed with any of the metrics in the question above, please explain why

- Together, these metrics do not showcase the breadth of work done by local authorities on environment, circular economy and climate change. There is immense value in including other metrics like emissions that are tracked and can be valuable to track progress. Given local and national climate targets, it becomes vital to track these here as well to ensure momentum and ambition is maintained.
- In the absence of a statutory duty on climate for local authorities, this could be a good Framework to report and ensure climate is prioritised locally. That would come with a wide range of co-benefits like clean air, economic growth, local jobs, warmer homes and better health which is why the inclusion of a variety of outcomes is essential.
- Deaths due to particulate matter does not indicate air quality, which is a vital metric to track and would better showcase local progress on reducing pollution and protecting public health. In addition, since most of people's

time is spent indoors it's also important to take that into account when thinking about air quality.

- Household waste metrics do not capture broader circular economy benefits, such as reduction in consumption, reuse, or sustainable materials management. In addition, the Framework would not capture reduction in waste itself which is the most positive climate outcome and an area where local authorities can make a big difference.

Q71. Do you think any other metrics should be added to indicate progress towards a priority outcome?

If you suggest alternative metrics please provide specific examples including links to data sources. They must meet our data standards as detailed in paragraph 27.

- **Greenhouse gas emissions data:** This is already being captured by [DESNZ](#) and could be a useful overall indicator to measure and track progress over time. It is available at local authority and place level and also links to the transport and housing interventions being undertaken by local authorities.
- **Renewable energy data, statistics** and planning applications that are approved - includes all forms of energy and storage that is compiled by DESNZ. This would create a clear link to the Government's Clean Energy 2030 Mission, planning reform and growth agenda.
- **Managing flood risk:** Data on flood defences, capital spend, and properties at risk is available at both regional and local authority levels, could be included given the increasing risk of flooding due to climate change and extreme weather events.
- The **National Community Energy Map** tracks community energy activity, including renewable generation, advice, and efficiency services, by local authority and other geographies. This could provide a useful metric for local renewable energy deployment, aligning with the government's forthcoming GB Energy Local Power Plan.
- **Clean Air:** we believe a more holistic approach to clean air should be included in the Framework, on possible option here could be using [DEFRA air quality data](#) which measure five pollutants: Nitrogen Dioxide, Sulphur Dioxide, Ozone, Particles < 2.5µm (PM2.5) and Particles < 10µm (PM10). This data is reported on a daily basis and could be used to develop an outcome based on reducing the number of High and Very High pollution days.
- Social value is already a requirement in local government procurement and could provide a basis for measuring outcomes such as biodiversity and waste minimisation, e.g. percentage of tender award linked to these themes.
- The Edinburgh Climate Change Institute has produced a [co-benefits atlas](#) that models 11 wider benefits of climate action. Data like this could be useful to look at co-benefits and over time with standardised Frameworks for monitoring could become useful datasets.

- **National Performance Indicators:** For a brief period (2008-11) Local Strategic Partnerships (lead by local authorities) signed up to report on and deliver against national performance indicators related to climate change:
 - NI185: reducing carbon emissions from local authority activities
 - NI186: reducing carbon emissions from across the local authority area
 - NI188: adapting to climate change.

Although Local Strategic Partnerships could choose which to adopt, two-thirds signed up to NI186, making it the fifth most popular indicator, frequently prompting action on climate change for the first time. Some of these could be restored and improved upon.

- The relevant indicators from [Outcome Indicator Framework for the 25 Year Environment Plan](#) should be reviewed and available local indicators could be included as well.

Q72. Are there any available metrics to measure local government's contribution to flood resilience?

- **Managing flood risk:** Data on flood defences, capital spend, and properties at risk is available at both regional and local authority levels, could be included given the increasing risk of flooding due to climate change and extreme weather events.

Q73. Are there any available metrics to measure local government's contribution to biodiversity?

- Biodiversity Net Gain (BNG): Local authorities are required to measure and report on BNG using the statutory biodiversity metric, which calculates biodiversity value in 'biodiversity units' for development projects. Other metrics under Local Nature Recovery Strategies could also be tracked.
- Local Sites, conservation areas, AONBs etc. are under local authority control and could be important metrics to track.
- Local authorities often produce annual biodiversity monitoring reports that track species populations, habitat conditions, and conservation efforts within their areas.
- Metrics could capture the outcomes reported in the first round of biodiversity duty reports, due 1 January 2026, to ensure local progress is aligned with statutory obligations and national biodiversity targets.

Q74. Relevant contextual information will be presented alongside the metrics e.g. detail of influencing factors outside of local authority control such as population demographics or geography. Is there specific contextual information you think should be captured alongside any of the metrics? Please be as specific as possible

- Population demographics and household density, as these can influence pressure on green spaces, biodiversity, and local environmental outcomes.
- Geography and urban/rural classification, since habitat availability, flood risk, and air quality vary with location and affect achievable outcomes.
- Local climate risks, including flood-prone areas, heat stress, and extreme weather, which impact biodiversity, green space usability, and resilience.

TRANSPORT AND LOCAL INFRASTRUCTURE

Q75. To what extent do you agree that these are appropriate measures to assess local progress against the priority outcome (given the standards set out in paragraph 27 of the feedback document)?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Public transport connectivity score to key services	<input checked="" type="checkbox"/>				
Passenger journeys on buses	<input checked="" type="checkbox"/>				
Passenger journeys on light rail for LAs in scope	<input checked="" type="checkbox"/>				
Percentage of adults who walk or cycle for travel purposes at least once per week	<input checked="" type="checkbox"/>				
Killed or seriously injured (KSI) per billion vehicle miles	<input checked="" type="checkbox"/>				
% local authority motorways and A roads where maintenance should be considered (local A roads & motorway, B&C roads, and unclassified)			<input checked="" type="checkbox"/>		
% B & C roads where maintenance should be considered			<input checked="" type="checkbox"/>		
% unclassified roads where maintenance should be considered			<input checked="" type="checkbox"/>		
Public EV charging devices per 100,000 population	<input checked="" type="checkbox"/>				

Vehicle kilometres on local bus services	✓				
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Q76. If you disagreed with any of the metrics in the question above, please explain why

- EV charging infrastructure does not look at the overall public transport system locally. For instance, lower levels of car ownership in some areas which could be due to better public transport would reduce the need for EV charging points. Without accounting for these variations, the metrics risk misrepresenting local progress and priorities. This metric does not capture their use, equity of access or alignment with local transport needs, as provision depends on geography, housing type, and travel patterns.
- Passenger journeys on buses and light rail show usage but do not indicate service quality, reliability, or integration with wider net zero transport goals.
- Current metrics focus heavily on infrastructure condition and usage, but underrepresent decarbonisation outcomes, active travel expansion, and reduction of transport emissions (domestic transport currently responsible for [30% of the total emissions](#)) which would also have wider health outcomes.

Q77. Do you think any other metrics should be added to indicate progress towards a priority outcome?

If you suggest alternative metrics please provide specific examples including links to data sources. They must meet our data standards as detailed in paragraph 27.

- **[Road transport energy consumption](#)**: Data on UK road transport energy use by local authority is already collected and published, providing a useful metric to track trends in local transport emissions and energy demand.
- **[Vehicles statistics](#)**: Data on licensed vehicles, including zero-emission vehicles is already collected nationally and could be included in the Framework to help monitor transport trends, support low-emission initiatives, and align with national decarbonisation goals. This would allow overall car and EV ownership to be explored and prioritised, alongside the EV infrastructure to support transition.
- **School travel**: We have spoken to partners working on school travel and who have worked in the sector when this was a separate census question. Data sets that could support interventions and action in this area could include:
 - Percentage of pupils walking to school.
 - Percentage of pupils using public transport to get to school.
 - Percentage of pupils with a viable public transport option to get to school.
 - Percentage of pupils living within 1 mile of school that travel actively to school.

As things stand there are no clear metrics on younger people's transport options or behaviour.

Q78. Do you have views on how the transport responsibilities at different tiers of government could be clearly reflected in the presentation of the metrics?

- Metrics should distinguish between outcomes councils can directly influence (e.g. active travel infrastructure, bus service support, local EV charging) and those dependent on national policy or funding.
- Where there is joint responsibility or dependency, it is important to note how the different agencies coordinate activities and whether there is a duty to cooperate or is one needed.
- Without this clarity, there is a risk that councils are held accountable for outcomes outside their control, particularly on large-scale infrastructure and rail provision.

Q79. Relevant contextual information will be presented alongside the metrics e.g. detail of influencing factors outside of local authority control such as population demographics or geography. Is there specific contextual information you think should be captured alongside any of the metrics?

Please be as specific as possible

- Population demographics, including age and income, as these affect transport choices and access to sustainable modes.
- Geography and urban/rural context, since density, distance to services, and settlement patterns shape transport demand and viable options.
- Car ownership levels and housing type, as these impact demand for EV charging and public transport provision.
- Local climate and air quality risks, including congestion hotspots or pollution levels, to contextualise health and sustainability outcomes.
- Availability of national funding and regulatory levers, as many transport outcomes depend on support from central government and operators.

ECONOMIC PROSPERITY AND REGENERATION (Contextual Outcome)

Q80. To what extent do you agree that these are appropriate measures to assess local progress against the priority outcome (given the standards set out in paragraph 27 of the feedback document)?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Gross value added per hour worked					
Gross median weekly pay					
Employment for 16-19 year olds					

Employment for 16-64 year olds					
Indices of Multiple Deprivation (IMD) average score					
Births of new enterprises					
Deaths of enterprises					
Number of high growth enterprises					
Business density					
Reducing poverty [placeholder]					
Employment support [placeholder]					

Q81. If you disagreed with any of the metrics in the question above, please explain why

- Many of the climate, circular economy and environment related programmes also have wider benefits around local job creation and economic growth. Unfortunately, due to limited funding and Frameworks these are often not tracked, which leads to these wider benefits going unnoticed. It would be beneficial if this process and outcomes could be inter-linked as well so these wider benefits can be tracked particularly the positive outcomes for the local economy.
- Green growth is a steadily growing sector. As per the [latest report by CBI Economics](#) the net zero economy has seen 10.1% growth in total economic value since 2023. In 2024, net zero businesses, 94% of which are SMEs, along with their supply chains contributed £83.1 billion to the economy and supported 2.9% of total UK employment.

Q91. Is there anything else you would like to feedback in relation to the Local Government Outcomes Framework?

- The Framework misses a major opportunity to support the UK's legally binding net zero target and, despite the framing, the Government's Plan for Change and the new national missions such as Clean Power by 2030 and the Warm Homes Plan. Climate priorities are underrepresented, with no clear indicators on emissions reduction, decarbonisation, energy efficiency, or sustainability; limiting councils' ability to embed these goals as core local priorities. We have also argued for the [English Devolution and Community Empowerment Bill](#) to have stronger measures on climate.
- **Opportunity to integrate the wider benefits:** The LGOF aims to link indicators across areas, offering a chance to capture wider co-benefits of initiatives. This can help align priorities across departments and enable joined-up working. However, climate action, which delivers health, energy,

and economic benefits, is largely absent from the metrics, limiting the Framework's ability to reflect these gains. [UK100's report](#) highlights these wider benefits through local case studies and clear recommendations for local and national government to improve their approaches to unlocking wider benefits.

- **Optional indicators could guide progress:** While relying on existing data is pragmatic, the Framework misses the chance to introduce critical new indicators that are not yet widely collected. Making these optional initially, with a view to adopting them more broadly over time, would provide clearer direction and help councils track progress against emerging priorities, especially under this relatively new and ambitious Government inheriting an established set of data that might not be aligned to their priorities..
- **Context matters:** The Framework takes a one-size-fits-all approach, but indicators need to be reviewed in line with local circumstances. For example, lower levels of car ownership in some rural areas which would indicate better public transport could reduce the need for EV charging points. Without accounting for these variations, the metrics risk misrepresenting local progress and priorities.
- **Measuring progress over time:** Each metric should highlight a clear direction of travel measurement, and not just be static figures. This would allow progress and trends to be recognised over time, ensuring councils are credited for improvements even if starting from a more challenging baseline.
- **Flexibility for local context:** The Framework should avoid being overly prescriptive, recognising that local authorities face different contexts and challenges. Councils should have the freedom to choose the most effective pathways to achieve outcomes, while working towards this clear suite of priorities, but this should also include context in the framing of what good or success looks like.